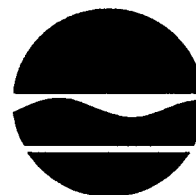


New York State Department of Environmental Conservation
Division of Environmental Enforcement
Onondaga Lake Unit
50 Wolf Road
Room 410A
Albany, New York 12233-5550



John P. Cahill
Acting Commissioner

Telephone: (518) 457-7821
Fax: (518) 457-7819 (not for service of process)

March 10, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip H. Gitlen, Esq.
Whiteman, Osterman & Hanna
One Commerce Plaza
Albany, NY 12260

RE: EPA/DEC CERCLA §104(e) Request: AlliedSignal, Inc.

Dear Mr. Gitlen:

This correspondence responds to AlliedSignal, Inc.'s ("Allied") reply to the United States Environmental Protection Agency's ("EPA") and the New York State Department of Environmental Conservation's ("Department") June 19, 1996 joint request for information. After review, the Department has identified numerous deficiencies in Allied's reply, as set out in the supplemental questions below. Pursuant to the Federal and State authorities set forth in the June 19, 1996 joint request, please submit the requested information within thirty (30) days of your receipt of this letter.

The June 19th joint request for information was written "... to request that Allied provide information which has not previously been submitted to DEC and EPA, and not as a request that Allied duplicate information previously submitted." Allied is not responsive to the inquiry in replying to certain questions by simply attaching a listing of documents allegedly in EPA's and the Department's possession. If documents in the Department's possession aid Allied in responding to a question, Allied may reference said documents, by page number of the individual documents, in its response; however Allied must answer each question fully as it applies to all of Allied's facilities.

When submitting Allied's response to the information requests below please include all the requested information and reference, by page number(s) of the individual document(s), appropriate or relevant passages or sections. If any such documents are currently in the Department's possession, please reference them to the appropriate response, by page number(s) of the individual document(s).

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1. A. Pursuant to question 4 of the joint request, please list all Allied's facilities, past and present, (i.e., Willis Avenue, LCP Bridge Street, etc..) located in the area encompassed by the joint request, by name, address and period of operation. For each of these facilities please provide the remaining information required by question 4, by either fully stating all responsive information or referring to a specific document(s), by page number(s) of the specific document(s).

B. Pursuant to question 4 of the joint request, please provide all information in Allied's or its attorneys' possession relating to that parcel of property, previously owned by Allied, which is bounded on the west by Willis Avenue and on the north by State Fair Boulevard. The response should include: a map of the property with dimensions, the period of Allied's ownership, the uses of the property, whether any materials were stored or disposed of on the property, the nature and quantity of such materials and copies of analytical data for any samples that may have been collected on, adjacent to, or downgradient of, the property. If any of the requested information was provided in the Willis Avenue RI Report, Allied may reference this in its response without providing the information.

C. Pursuant to question 4 of the joint request, please indicate how and where light oils generated from the coal ovens were handled, stored and disposed of prior to 1917, when the Benzol Plant began operating.

2. Pursuant to question 5 of the joint request, please respond to that question regarding all the facilities addressed in Allied's response to question 1 of this request. For those facilities addressed in the Site History Report, please identify each facility by name and the respective page(s) of the Site History Report that addresses this question.

3. A. Pursuant to question 6 of the joint request, please respond to that question regarding all the facilities addressed in Allied's response to question 1 of this request. Please note that the question asks for information regarding the facilities "waste streams" not "waste streams to Onondaga Lake," as is stated in response 6(a) of Allied's reply. For each such waste stream please provide all analyses of the chemical composition of the waste stream.

B. Pursuant to question 6 of the joint request, please provide any information in Allied's or its attorneys' possession regarding the semi-volatile compounds PXE and PTE, as identified in the document titled "Sources of Organic Contaminants to Onondaga Lake," by John Hassett and Shawn Hubbards. Please include any information relating to the origin of these compounds, their extent in Onondaga Lake and its tributaries, and their toxicity.

4. Pursuant to question 7 of the joint request, please respond to that question regarding all the facilities addressed in Allied's response to question 1 of this request.

5. Pursuant to question 7 of the joint request, please clarify the ambiguity between Allied's responses numbered 6a and 7a, regarding the Split Rock Limestone Quarry. Response 6a stated that there were "no waste streams to Onondaga Lake." This statement does not rule out a waste stream to someplace else within the scope of this inquiry. Response 7a stated that Allied has "no record of waste streams" for the Split Rock facility. Please indicate whether any waste streams existed for this facility.

6. Pursuant to question 8 of the joint request, please respond to that question regarding all the facilities addressed in Allied's response to question 1 of this request. Allied's response should include information and documentation regarding transporters and disposal facilities.

7. Pursuant to question 9 of the joint request, please respond to that question regarding all the facilities addressed in Allied's response to question 1 of this request. Please include any information regarding releases at any of Allied's facilities.

8. Pursuant to question 10 of the joint request, please respond to that question regarding all the facilities addressed in Allied's response to question 1 of this request and all releases addressed in Allied's response to question 7 of this request.

9. Allied's reply to question 11 of the joint request is not responsive. Allied itself noted in its reply that it has not identified the appropriate persons responsively. Question 11 requires more than just a listing a few past managers of Allied's Syracuse Works. Please respond to the question in its entirety, as required by the underlying Federal and State authority set forth in the June 19th joint request.

10. As required by question 12 of the joint request, please provide a listing of hazardous material information, agreements regarding waste products, manifests, permits, licenses, discharge monitoring reports and notices of violation for all the facilities addressed in Allied's response to question 1 of this request.

11. Pursuant to question 13 of the joint request, please respond to that question regarding all the facilities addressed in Allied's response to question 1 of this request.

12. Question 14 of the joint request requires Allied to produce certain information regarding various insurance policies Allied carries or has carried. This request is not "burdensome and unnecessary" as Allied claims in its reply. Rather, §104(e)(2)(C) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 U.S.C. 9601 et seq., expressly states that, in a §104(e) request, EPA can require the disclosure of information regarding a party's ability to pay.

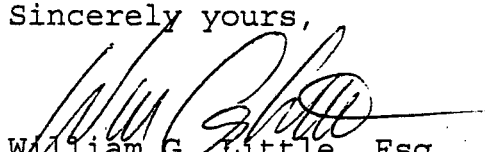
Therefore, please submit the information as required by question 14 of the joint request.


13. Pursuant to question 15 of the joint request, please provide an inventory of current and historical aerial (vertical and oblique) and ground level photographs of Allied's manufacturing and waste disposal areas. Please include in this inventory all photographs that are in Allied's or its attorneys' possession. The inventory must include, where applicable: the date of the flight, the scale and dimensions of the photographs, the film type, the percentage of cloud cover, the area of coverage and the photograph frame numbers.

In addition, Allied did not sign the certification provided at the end of the inquiry. A certification is enclosed herewith, covering both the response to this supplemental inquiry and Allied's original response. Please ensure that Allied signs this certification and returns it with its response to this request.

We hope that EPA's and the Department's receipt of this supplemental information will complete Allied's response. The Department and EPA will continue to review Allied's submittal and therefore must reserve our rights to ask for further supplemental information at a later date. Please contact Mr. Little at the above telephone number if you have any questions regarding this matter.

Sincerely yours,


William G. Little, Esq.
Associate Attorney
Onondaga Lake Unit


George A. Shanahan, Esq.
Assistant Regional Counsel
EPA Region 2

cc: G. Shanahan, EPAREG2
A. Hess, EPAREG2
A. Peterson
T. Larson

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of _____

County of _____

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA/DEC Joint Request for Information), all documents submitted herewith, as well as the response and accompanying documents submitted on August 19, 1996, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that my company is under a continuing obligation to supplement its responses to EPA's and DEC's Request for Information if any additional information relevant to the matters addressed in EPA's and DEC's Request for Information or the company's response thereto should become known or available to the company.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this
day of _____, 1997.

Notary Public